

REMARKS

Reconsideration and further examination of the subject patent application in view of the present Amendment and the following Remarks is respectfully requested. Claims 1-3 and 5-27 are pending in the application. Claims 1-3 and 5-27 stand rejected. Claims 1-3 and 5-27 have been rejected under 35 U.S.C. §103(e) as being unpatentable over U.S. Pat. No. 6,324,681 to Sebesta et al. ("Sebesta") in view of U.S. Pat. No. 6,238,537 to Gryphon et al. ("Gryphon"). Claims 10 and 13 have also been rejected under 35 U.S.C. §103(a) as being unpatentable over Sebesta and Gryphon further in view of U.S. Pat. No. 6,078,982 to Du et al. ("Du"). Claims 1, 14, and 20 have been amended and claims 26-27 have been cancelled. After careful review of the claims as amended, it is believed that the claims are in allowable form and therefore allowance is respectfully requested.

Independent claim 1 is limited to defining a new event structure and a workflow for a new event source without modifying the workflow server engine, creating a conditional event rule associated with the workflow, the workflow configured to return a result to the event source via a callback to enable correction of data structures in the event of workflow failure (see e.g. p. 18-20). Independent claims 14 and 20 are similarly limited.

The claims are limited to events with business rule solutions. In contrast, Sebesta is directed to accessing a service on an enterprise server. The functions of Sebesta are directed to the technical details of computer interfaces. The business problems described in the Specification of the instant application could not be solved by the system described in Sebesta. Sebesta does not disclose defining a new event structure or creating a new workflow for a new event source without modifying the workflow engine, and creating a conditional event rule that returns a result to the event source via a callback. The Office action concedes that Sebesta does not disclose the conditional event rule but asserts that Gryphon does. Gryphon describes a workflow modeling language using visual representations of business applications. This system is conceptually entirely different from the transaction processing system with workflow engine of the claims. Gryphon, for example, at the cited passages at Col. 5, line 60 to Col. 6, line 20, and Col. 7, lines 14-57 merely describes business process actions, while Col. 10, lines 20-40 is merely a claim for generation of a business model. The claims, however, require return of a result to the event source via a callback to enable correction of data structures in the event of a workflow failure. Further, neither reference describes adding a new event structure and workflow without modifying the workflow engine as claimed. These features are not taught or suggested by Sebesta or Gryphon.

Further, an executable function (or data link library) that triggers workflows is programmed to select a workflow based upon the type of event rather than upon the identity of the user. As an example, a telephone call would require an entirely different executable function or data link library than an e-mail. The claimed invention is thus set in the context of "transaction routing including telephone call routing, e-mail routing, and Web request routing from an event source to a software or human agent" (Specification, page 9, lines 13-15). In this context, "Depending upon the business rules, the response may include various steps including routing a query to one of the agent desktop clients 128, automatically responding to the event, etc. . . . The workflow-driven business rules 114 may be a simple process or maybe a complex process with multiple steps and the exchange of information between the workflow server engine 110 and the event source" (Specification, page 9, lines 2-7).

The Sebesta gateway is set in the context of a single event (i.e., a user requests and receives access to a service on an enterprise server). In contrast, "Workflows are typically associated with one or more events from a given event source, thereby allowing a workflow designer the choice of using event parameters in the business logic" (Specification, paragraph beginning on line 22 of page 7 and continuing to line 2 of page 8).

Further, even in very simple cases (e.g., an agent accessing a database) the novel use of the executable function that triggers workflows provides benefits that are not available under Sebesta. For example, a "benefit the present invention provides is an improved handling of exceptions" (Specification, page 40, lines 11-12).

In general, Sebesta combined with Gryphon does not have the flexibility or utility of the claimed invention because Sebesta with Gryphon does not define events in the same way or teach creating a business rule workflow, creating executable functions that trigger business rule responses, associated business rule workflows, creating conditional event rules associated with the workflow, or returning a result to the event source via callback to enable correction. Since Sebesta and Gryphon do not have these capabilities, Sebesta and Gryphon do not render the claimed invention obvious and therefore all the claims are distinguishable over the combination of Sebesta and Gryphon.

Further, claim 10 calls for preventing changes to the workflow databases when the workflow is in use (see e.g. p. 38, lines 1-9), and claim 13 requires maintaining a sorted list of rule sets, and searching the sorted list in order upon receiving a workflow event (see e.g. p.39, lines 5-10). These features are also not disclosed by Sebesta or Gryphon, however, the Office Action asserts that these

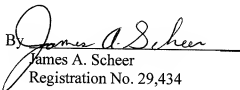
features are disclosed by Du at Col. 2, lines 32-49; Col. 6, lines 47-Col. 7, line 44 to Col. 10, line 4. However, Du, at Cols. 2, 9, and 10 merely describes a system for allowing consistent workflow process which locks data specified for future access by the workflow process from being accessed before the workflow process is commenced. This does not teach locking data from being changed during use by the workflow engines. Regarding claim 13, Du at Cols. 6-7 merely describes a workflow engine, HP Open PM, which steps through a workflow, the queue manager 67 of Fig. 4 is not described and maintenance of a sorted list of currently loaded event to workflow rules sets, and a search of such a list is not described. Thus, claims 10 and 13 are believed to be further distinguishable over the cited references.

For the foregoing reasons, applicant submits that the subject application is in condition for allowance and earnestly solicits an early Notice of Allowance. Should the Examiner be of the opinion that a telephone conference would expedite prosecution of the subject application, the Examiner is respectfully requested to call the undersigned at the below-listed number.

The Commissioner is hereby authorized to charge any additional fee which may be required for this application under 37 C.F.R. §§ 1.16-1.18, including but not limited to the issue fee, or credit any overpayment, to Deposit Account No. 23-0920. Should no proper amount be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal, or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 23-0920. A duplicate copy of this sheet(s) is enclosed.

Respectfully submitted,

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